

FOR THE NORTHERN DISTRICT OF ILLINOIS

PENSION BENEFIT GUARANTY
CORPORATION, on its own behalf and on behalf
of the Retirement Program of Liam Ventures, Inc.,

Plaintiff,

v.

WILLIAM F. FARLEY,
et al.

Defendants.

Civil Action No. 08CV2529

**AGREED-UPON MOTION TO EXTEND TIME FOR DEFENDANTS TO
ANSWER OR OTHERWISE RESPOND**

In this agreed-upon motion, Defendants William F. Farley, the Administrative Committee of the Retirement Program of Liam Ventures, Inc., Kevin Donegan, Sheryl McCreary, Martin Pajor, Steve Seder, Todd Sluzas and David Wilson (collectively, “Defendants”), by their undersigned counsel, hereby request that the Court extend the time for them to answer or otherwise respond to the Complaint. Plaintiff, the Pension Benefit Guaranty Corporation, agrees to this request. In support of this motion, the Defendants state as follows:

1. Plaintiff filed its Complaint on May 2, 2008.
2. Under the current schedule, Defendants must answer or otherwise respond to the Complaint by August 25, 2008.
3. Because of the complexity of the allegations in this matter and the number of individual Defendants, Defendants require additional time to collect the information needed to thoroughly and accurately answer or otherwise respond to the Complaint.

4. Defendants request that their deadline to answer or otherwise respond to the Complaint be extended up to and including September 15, 2008.

5. Plaintiff does not oppose this motion, and the Defendants have not requested any previous extensions from the Court.

Dated: August 21, 2008

Respectfully submitted,

/s/ Sara A. Weinberg
Sara A. Weinberg
JACKSON LEWIS LLP
320 West Ohio Street, Suite 500
Chicago, IL 60610
Tel. No. (312) 787-4949
Fax No. (312) 787-4995
E-Mail: Weinbers@jacksonlewis.com

- and -

/s/ Carol Connor Cohen
Carol Connor Cohen
Nancy S. Heermans
Valerie Webb
ARENT FOX LLP
1050 Connecticut Avenue, NW
Washington, DC 20036
Tel. No. (202) 857-6000
Fax No. (202) 857-6395
E-mail: Cohen.carol@arentfox.com
Heermans.nancy@arentfox.com
Webb.valerie@arentfox.com

*Attorneys for Defendants Administrative Committee of
the Retirement Program of Liam Ventures, Inc., Kevin
Donegan, Sheryl McCreary, Martin Pajor, Steve Seder,
Todd Sluzas and David Wilson*

/s/ Bernard J. Nussbaum
Bernard J. Nussbaum
Richard L. Fenton
SONNENSCHN NATH & ROSENTHAL LLP
7800 Sears Tower
233 South Wacker Drive
Chicago, IL 60606
Tel. No. (312) 876-8000
Fax No. (312) 876-7934
E-mail: bnussbaum@sonnenschein.com
rfenton@sonnenschein.com

Attorneys for Defendant William F. Farley

AGREED TO:

/s/ Joel W. Ruderman
Israel Goldowitz
Chief Counsel
Karen Morris
Deputy Chief Counsel
Kartar Khalsa
Assistant Chief Counsel
Joel W. Ruderman
Assistant Chief Counsel
Frank Anderson
John H. Ginsberg
Cassandra Burton
Attorneys
PENSION BENEFIT GUARANTY CORPORATION
Office of the Chief Counsel
1200 K Street, NW
Washington, DC 20005
Tel. No. (202) 326-4020, ext. 3732
Fax No. (202) 326-4112
E-mail: ginsberg.john@pbgc.gov and
efile@pbgc.gov

Attorneys for Pension Benefit Guaranty Corporation

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on **August 21, 2008**, she caused the foregoing to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record registered with the Court's ECF/CM system, including:

ISRAEL GOLDOWITZ

Chief Counsel

KAREN MORRIS

Deputy Chief Counsel

KARTAR KHALSA

Assistant Chief Counsel

JOEL W. RUDERMAN

Assistant Chief Counsel

FRANK ANDERSON

JOHN H. GINSBERG

CASSANDRA BURTON

Attorneys

PENSION BENEFIT GUARANTY CORPORATION

Office of the Chief Counsel

1200 K Street, N.W.

Washington, D.C. 20005

Bernard J. Nussbaum, Esquire

Richard L. Fenton, Esquire

SONNENSCHN NATH & ROSENTHAL LLP

7800 Sears Tower

233 South Wacker Drive

Chicago, IL 60606-6404

Carol Connor Cohen, Esquire

Nancy S. Heermans, Esquire

Valerie Webb, Esquire

ARENT FOX LLC

1050 Connecticut Avenue, N.W.

Washington, D.C. 20036-5339

Dated: August 21, 2008

By: /s/ Sara A. Weinberg
Sara A. Weinberg